

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

RASHETA BUNTING, Individually and
as representative of a class of similarly situated persons,

Case No. 1:23-cv-4478

Plaintiff,

against -

QC TERME NY LLC,

Defendant.

**JOINT STIPULATION FOR DISMISSAL OF ENTIRE ACTION WITH
PREJUDICE PURSUANT TO F.R.C.P. 41(a)(1)(A)(ii)**

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiff RASHETA BUNTING (“Plaintiff”) and Defendant QC TERME NY LLC (“Defendant”) stipulate and jointly request that this Court enter a dismissal with prejudice of Plaintiff’s Complaint in the above-entitled action in its entirety, with the Court to retain jurisdiction over the parties and the action for 24 months for the sole purpose of enforcement of the parties’ obligations under their Confidential Settlement Agreement and General Release, including Defendant’s good faith efforts regarding ADA Compliance.

Each party shall bear her or its own fees, costs and attorneys’ expenses.

Respectfully submitted,

Date: Aug. 31, 2023

SHAKED LAW GROUP, P.C.



Dan Shaked, Esq.

SHAKED LAW GROUP, P.C.

14 Harwood Court, Suite 415

Scarsdale, NY 10583

Tel. (917) 373-9128

Email: ShakedLawGroup@gmail.com

*ATTORNEYS FOR PLAINTIFF AND THE
CLASS*

Dated: September 6, 2023

BAKER & McKENZIE LLP



Charles B. Cummings
NY Registration No. 1082486
BAKER & McKENZIE LLP
452 Fifth Avenue
New York, New York 10018
Tel: +1 212 626 4100
Fax: +1 212 310 1600
Email: charles.cummings@bakermckenzie.com

*ATTORNEYS FOR DEFENDANT
QC TERME NY LLC*